

**MIRIAM TAUBER LAW**  
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**MEMO ENDORSED**

September 8, 2022

**Via ECF**

Hon. Katherine Polk Failla, U.S.D.J. (S.D.N.Y.)

**Re: *Rubenstein v. Union Bridge Holdings, Ltd. et. al., No. 21-CV-8133-KPF***

**Joint Request for 30-Day Extension of Summary Judgment Briefing Schedule**

Your Honor:

I write on behalf of the Plaintiff with Defendants' support to respectfully request a 30-day adjournment of the briefing schedule set by the Court for Plaintiff's proposed Motion for Summary Judgment (*see* Order, Dkt #42)

Plaintiff and Defendants have been engaged in good faith settlement discussions since they were unable to resolve Plaintiff's §16(b) claim at the mediation held before Judge Gorenstein on July 27, 2022. These conversations have proceeded at a slow pace, which Plaintiff understands is due to delays in communicating with the foreign Defendants given the need for a translator, etc.

The parties jointly propose a 30-day extension of the summary judgment briefing schedule set by the Court to allow the parties' settlement discussions to continue. The current and proposed revised schedule is as follows:

	<b><u>Current Deadline</u></b>	<b><u>Proposed Deadline</u></b>
Plaintiff's Motion for Summary Judgment	September 12, 2022	October 12, 2022
Defendants' Opposition	October 10, 2022	November 10, 2022
Plaintiffs' Reply	October 24, 2022	November 23, 2022

This is the first request for an extension of the summary judgment briefing schedule.

No other deadlines will be impacted.

Respectfully,

/s/ Miriam Tauber

Miriam Tauber, *Attorney for Plaintiff*

**cc (via ECF):** Counsel for Defendants Mary Ho, Moana Ho, Lily Ho

**cc (via email):** Registered Agent for Nominal Defendant Union Bridge Holdings, Ltd.  
 (Corp. Creations Network ATTN: Sean Arno; [contactus@corpcreations.com](mailto:contactus@corpcreations.com))

Application GRANTED. To accommodate ongoing settlement discussions, the parties shall adhere to the following briefing schedule:

Plaintiff's motion for summary judgment is due **October 12, 2022**; Defendants' opposition is due **November 10, 2022**; and Plaintiff's reply is due **November 23, 2022**.

The Clerk of Court is directed to terminate the motion at docket entry 43.

Dated: September 9, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE